

EXHIBIT 12

PRIMECARE

MEDICAL, INC. +

March 22, 2017

NCCHC
1145 W. Diversey Pkwy.
Chicago, IL 60614

To NCCHC Accreditation Department:

This letter is in response to the NCCHC Accreditation Update Report, dated January 31, 2017, for the Bucks County Correctional Facility, located in Doylestown, Pennsylvania.

The cited deficiencies with corrective actions are as follows:

J-C-06 Inmate Workers - *Inmates should not be used as substitutes for regular program staff.*

J-G-05 Suicide Prevention Program – *The use of other inmates in any way (e.g., companions, suicide prevention aides) is not a substitute for staff supervision. Inmate companions can be used as a supplement to, but never as a substitute for, staff monitoring.*

In both instances, it is asserted that inmates are still used in place of officers for the watches: regular watch inmate workers is defined as occurring at staggered 15-minute intervals, with staff monitoring at 30-minute intervals. Additionally, while the acutely suicidal are monitored constantly, they are monitored by inmates, with staff monitoring every 15 minutes. The use of inmate workers may only supplement the monitoring of suicidal inmates (whether acutely or non-acutely suicidal) by trained staff.

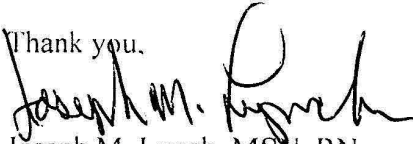
On follow-up by the HSA, the following corrective steps were taken in order to assure patient safety and staff compliance with the process:

- Bucks County Correctional Facility's SOP B-4.66 (Suicide Prevention Program) was enacted March 17, 2017 and specifies the types of watches employed at the facility and defines the role of correctional staff pertaining to *Constant Observation, Level 1 and Level 2 Suicide Watches, and Level 3 – Psychiatric Observation* (submitted as evidence).
- Bucks County Correctional Facility SOP B-3.23 (Watch and Observation Officer Post Order) was enacted March 20, 2017 and lists the duties and responsibilities of correctional officers during all types of suicide watches (submitted as evidence).
- The Captain's memo to shift command, dated March 20, 2017, directed that correctional staff is to be educated at roll call through March 25, 2017 pertaining to the provisions of SOP B-3.23 (Watch and Observation Officer Post Order)(submitted as evidence).


- A letter from Director of Training, Richard Vona to Warden Lagana, dated March 22, 2017, stipulates that training on Post Order B-3.23 and SOP B-4.66 has been added to annual in-service training and will be delivered to all staff on an on-going basis (submitted as evidence).
- Ongoing education and reinforcement of the suicide prevention process by the HSA and facility administration will result in full staff compliance yielding enhanced patient safety

If you have any further questions please feel free to contact me at (215)345-3752.

Thank you,

A handwritten signature in black ink, appearing to read "Joseph M. Lynch". The signature is fluid and cursive, with a large initial "J" and "L".

Joseph M. Lynch, MSN, RN
Health Services Administrator
Bucks County Correctional Facility

		BUCKS COUNTY DEPARTMENT OF CORRECTIONS STANDARD OPERATING PROCEDURES AND GUIDELINES	
Title:		Suicide Prevention Program	
Section:	B-4.66	Applicability:	Correctional Facility
Policy/Document Cross Reference:		None	
Promulgating Department:		Correctional Facility – Mental Health	
Effective Date:	3/17/2017	Review Date:	
		Revision Date:	3/17/2017
Authority:	Director/Warden <i>[Signature]</i>		
Related Statutes and/or Standards:		PA Title 37:	N/A
		ACA:	

POLICY

To provide a program for identifying, responding and, hopefully, preventing suicide by inmates. This policy requires that a written plan for identifying and responding to suicidal individuals be developed, implemented when needed, and reviewed periodically by Administration. The DOC also endorses the philosophy that every effort will be made to prevent suicides and serious suicide attempts through identification of individuals at risk for suicide through implementation of this policy and its associated procedures.

Inmates may become suicidal at any time during their incarceration. Suicidal behavior is more likely at critical periods of time including commitment and the first several days thereafter, court hearings, sentencing, new criminal charges, after adjudication, following the receipt of bad news regarding self or family, after suffering some type of humiliation or rejection, and those who are in the early stages of recovery from severe depression.

In 100% of situations involving suicide attempts and completed suicides, a comprehensive clinical review is to be conducted. Remedial action is taken on identified policy, staff performance, environment, and system failures that may have contributed to suicide. The remedied change(s) are successful in preventing future suicides and reducing serious suicide attempts.

PREVENTION

All DOC staff, contractors and vendors receive training in the identification, monitoring and intervention used in suicide prevention.

1. Training is provided annually by a certified Mental Health professionals to include verbal and behavioral clues that indicate potential suicide, and how to respond appropriately.
2. If a staff member identifies someone who is potentially suicidal, the inmate is placed on suicide precautions and is referred immediately to mental health staff. The Mental Health staff will act upon a referral of a non-emergency within twenty-four (24) hours. Emergencies will be handled immediately. A suicide watch may be initiated by correctional staff (Shift Commander), mental health or medical provider.
3. The licensed mental health professional will designate an individual's level of suicide risk and level of supervision needed.
4. Procedures for communication between correctional staff, mental health and medical providers and transferring authorities regarding the status of the inmate must be in place to provide clear and current information. The communication must be in written/electronic format (Offender Management System Alerts).
5. Housing/Monitoring.
 - A. An inmate who is identified as being at risk for suicide shall be placed in an area where regularly scheduled observations are made and those observations documented. If possible, an inmate on suicide watch should not be placed in isolation (or single celled). Rather he/she should be housed with another inmate or in dormitory style housing and checked on an irregular schedule not to exceed the maximum interval indicated by the specific suicide watch level.
 - B. The room should be as suicide proof as possible (without protrusions of any kind that would enable a hanging). If the potentially suicidal inmate is deemed to be at high risk, constant observation is required. Use of inmates for constant observation is not permitted.
 - C. The use of inmates in any way (e.g. companions, suicide prevention aids) is not a substitute for staff supervision.
 - D. All inmates on suicide precautions may be allowed all routine privileges e.g. visitation, telephone calls, out-of-cell time, unless it is contraindicated with written justification, on a case by case basis, by a licensed mental health professional except in cases where the inmate has lost privileges as the result of disciplinary sanctions.

Levels of Suicide Watch

1. **Constant Observation** - This level is reserved for the inmate who is actively suicidal, either threatening or engaging in self-injurious behavior and would be considered an extreme risk for suicide or serious self-injury. Staff shall observe such an inmate on a continuous

uninterrupted basis and have a clear unobstructed view of the inmate at all times. Observations shall be documented at ten- minute intervals. **Only licensed mental health professionals can modify or discontinue suicide watch levels.**



2. **LEVEL I – Suicide Watch** - This level is for inmates who are not actively suicidal but
 - express suicidal ideation and have a plan to commit suicide
 - have recently (within 60 days) attempted suicide
 - engaged in serious self-injurious behavior, or
 - demonstrates other concerning behavior (through actions, current circumstances or recent history) indicating the potential for self-injury.
 - A. This level may be utilized whenever staff (e.g. nursing, custody staff) believes an inmate is at moderate to high risk for suicidal behavior, pending an evaluation by a licensed mental health professional.
 - B. Inmates on this level are issued a suicide smock, suicide blanket, and suicide mattress. The cell is stripped of potentially dangerous items. The inmate will not be permitted underwear, sharps, belts, and shoelaces. The inmate will receive meals as "finger food" as no utensils are permitted on this level. Hygiene articles such as toothbrush, toothpaste, toilet paper are stored in the inmate's property. Hygiene supplies must be requested from security staff who will closely observe their use.
 - C. Exercise (out of cell time) and showers may be provided for the same amount of time and frequency as inmates do in general population.
 - D. Staff shall observe the inmate at random, staggered intervals not to exceed fifteen (15) minutes, (e.g. 5, 11, 7). The checks will be made by direct visual observation of the inmate to verify movement. All checks will be documented.
 - E. Only licensed mental health professionals can modify or discontinue suicide watch levels.
3. **LEVEL II – Suicide Watch** - This level is for the inmate who has suicidal ideation but no plan to commit suicide. This level is for inmates who are not actively suicidal, but express suicidal ideation (e.g. a wish to die without a specific threat or plan) and/or has a prior history of self-destructive behavior. This also applies to inmates that deny suicidal ideation, but demonstrates other concerning behavior (through actions, current circumstances, or recent history) indicating the potential for self-injury.
 - A. Level II is also used as a step down from a Level I watch

- B. Inmates on this level are issued a jumpsuit, shoes (no shoelaces), and suicide blanket. They continue to have finger food. They are placed in a stripped cell with no underwear, no sharps, and no belts.
 - C. Exercise (out of cell time) and showers may be provided for the same amount of time and frequency as inmates do in general population.
 - D. Staff shall observe the inmate at staggered intervals not to exceed 15 minutes (e.g. 5, 11, 7). The checks will be made by direct visual observation of the inmate to verify movement. All checks will be documented.
 - E. Only licensed mental health Professionals can modify or discontinue suicide watch levels.
4. **LEVEL III – Psychiatric Observation** - This level is not used for suicide prevention, but reserved for the inmate whose behavior warrants closer observation. It does not meet criteria for suicide precaution. This level of observation typically involves observation of an inmate at staggered intervals not to exceed 30 minutes (e.g. 15, 20, 25). Correctional staff must document the 30 minutes checks. Use of this level of observation occurs only as a step down from other suicide levels.
- A. Inmate has all rights and privileges as he/she would in general population. The inmate will wear regular prison issue and underwear and be provided a mattress, linen and blanket, and all hygiene items. Inmates are permitted shower shoes and sneakers/shoes with laces.
 - B. Food is provided on a regular tray with eating utensils and drinking cup
 - C. Exercise (out of cell time) and showers are provided for the same amount of time and frequency as inmates do in general population.

Potentially suicidal inmates and inmates that have attempted suicide are referred to a licensed mental health professional for evaluation.

An inmate who was evaluated as being at risk for suicide by a licensed mental health professional should not go from constant watch, level I, and level II suicide watch to general population. Inmates must be stepped-down to successive less restrictive levels of suicide watch before being cleared for general population. Once an inmate/patient is placed on suicide watch, he/she can only be cleared from the watch by a licensed mental health professional.

In all cases security policies supersede suicide prevention plans. The suicide prevention plan may be altered to meet the needs of each individual situation.

		BUCKS COUNTY DEPARTMENT OF CORRECTIONS STANDARD OPERATING PROCEDURES AND GUIDELINES	
Title:	Watch and Observation Officer		
Section:	B-3.23	Applicability:	Correctional Facility
Policy/Document Cross Reference:		B-4.66	
Promulgating Department:		Operations/Inmate Services	
Effective Date:	3/28/2017	Review Date:	
		Revision Date:	
Authority:	Director/Warden 		
Related Statutes and/or Standards:		PA Title 37:	
		ACA:	

Listed below are the duties and responsibilities of the correctional officer during all types of watches.

1. **CONSTANT WATCH** - This level of watch is for an inmate who is actively/acutely suicidal either threatening or engaging in self-injurious behavior and would be considered an extreme risk for suicide or serious injury.
 - A. A CORRECTIONS OFFICER will be assigned to watch an inmate on this type of watch.
 - B. The inmate will be in a stripped cell and will only have a suicide vest.
 - C. The officer will maintain a constant view of the inmate and will record his activity in 10 minute intervals on the acute watch monitor form.
 - D. An inmate on this type of watch will receive finger food, and their cell will be searched daily.
 - E. Only a licensed mental health professional can modify or discontinue this type of suicide watch.
2. **LEVEL 1** - This level of watch is for an inmate who has expressed suicidal ideation and have a plan to commit suicide, have recently attempted suicide within the last 60 days, engaged in serious self-injurious behavior or demonstrate other concerning behavior through actions, current circumstances or recent history.
 - A. An inmate on this type of watch will be in a stripped cell with a suicide smock and a suicide blanket.

- B. During this type of watch an inmate monitor will be posted outside the cell and maintain constant observation of the inmate and record their activities every 5 minutes on acute watch monitor form.
 - C. THE OFFICER IS RESPONSIBLE FOR OBSERVING THE INMATE AT RANDOM INTERVALS NOT TO EXCEED 15 MINUTES AND RECORD THE INMATE ACTIVITIES ON THE ACUTE WATCH MONITOR FORM.
 - D. An inmate on this type of watch will receive finger food, and their cell will be searched daily.
 - E. Only a licensed mental health professional can modify or discontinue this type of suicide watch.
3. **LEVEL 2** - This level of watch is for an inmate who has suicidal ideation but no plan to commit suicide. This inmate is not actively suicidal but express a prior history of self-destructive behavior and demonstrates other concerning behavior through their actions, current circumstances or recent history, indicating a potential for self-injury.
- A. An inmate on this level of watch will be in a stripped cell with a prison uniform, a suicide mattress, a suicide blanket and shoes with NO SHOELACES.
 - B. During this type of watch an inmate monitor will be posted outside the cell and maintain constant observation of the inmate and record his activities every 5 minutes on acute watch monitor form.
 - C. THE OFFICER IS RESPONSIBLE FOR OBSERVING THE INMATE AT RANDOM INTERVALS NOT TO EXCEED 15 MINUTES AND RECORD THE INMATE ACTIVITIES ON THE ACUTE WATCH MONITOR FORM.
 - D. An inmate on this type of watch will receive finger food, and their cell will be searched daily. Only a licensed mental health professional can modify or discontinue this type of suicide watch.
4. **LEVEL 3** – This level of watch is not used for suicide prevention, but reserved for the inmate whose behavior warrants closer observation.
- A. This inmate will have all the privilege of any other inmate.
 - B. The inmate monitor will observe their activities every 15 minutes and log them on the monitor form.
 - C. The officer will observe all inmates including inmates on this level of watch in staggered intervals not to exceed 30 minutes and make the appropriate entries in the electronic log books. (ex. all inmates observed no issue to report at this time).

Lynch, Joseph M.

From: Landis, Greg S.
Sent: Monday, March 20, 2017 1:42 PM
To: Bahlaj, Michael C.; Bankhead, Laney; Burkart, Robert D.; Clayton, Mark A.; Coyne, James M.; Greene, Christopher A.; Griffin, James E.; Kratz, David L.; Purchase, Philip S.; Brown, Christopher M.; Feliciano, Ronald; Gauntt, Mark S.; Gill, Jacquelyn M.; Hartman, Matthew; Kovach, Andrew J.; Lynn, Andrew J.; Mazzocchi, Daniel J.; Minasian, Nick L.; Nottingham, James H.; Rupp, David K.; Vingless, Greg J.; Whitesell, Joseph D.
Cc: Lynch, Joseph M.; Budd, Lil H.
Subject: Emailing: B-3.23 Watch and Observation Officer
Attachments: B-3.23 Watch and Observation Officer.docx

Bring the following attachment up at roll call for the next 5 days.

Attached is the new procedures that the officers should be following for all types of watches. This information should be gone over with all staff at roll call for the next 5 days. It will also be addressed at staff in service training over the next couple of months to insure everyone is aware of the procedure.

Your message is ready to be sent with the following file or link attachments:

B-3.23 Watch and Observation Officer

Note: To protect against computer viruses, e-mail programs may prevent sending or receiving certain types of file attachments. Check your e-mail security settings to determine how attachments are handled.



County of Bucks

POLICE TRAINING CENTER
1760 S. EASTON ROAD, DOYLESTOWN, PA 18901
PHONE (215) 340-8410 -- FAX (267) 885-1341



County Commissioners

CHARLES H. MARTIN, CHAIRMAN
ROBERT G. LOUGHERY, VICE CHAIRMAN
DIANE M. ELLIS-MARSEGLIA, LCSW

RICHARD VONA
DIRECTOR

March 22, 2017

Warden Paul K. Lagana
Bucks County Corrections
1730 S. Easton Road
Doylestown, Pa. 18901

Dear Warden Lagana:

After reviewing Post Order B-3.23 and updated Policy B-4.66 both relating to watches to include suicide watches (constant watch) and the remaining three (3) levels of watches. The training department will provide training on these policies to all security staff during In-Service training, this will be completed by the end of the 2017 In-Service presentations.

Non-Security staff will be presented with this updated information when they are scheduled by their supervisor to attend In-Service training.

In order to comply with the policy we will institute the following changes in training going forward:

1. Mental health professionals will present suicide prevention for In-Service training starting in 2018.
2. Corrections administration will schedule and provide suicide prevention training for all contractors and vendors yearly, this in addition to scheduling staff for required In-Service training. Training records provided to the training department will be maintained in the corrections training data base.

Sincerely,

Richard Vona
Director, Law Enforcement Training

RV/dmr

PRIMECARE MEDICAL, INC. +

October 27, 2016

NCCHC
1145 W. Diversey Pkwy.
Chicago, IL 60614

To NCCHC Accreditation Department:

This letter is in response to the NCCHC Accreditation Report, dated June 30, 2016, for the Bucks County Correctional Facility, located in Doylestown, Pennsylvania.

The cited deficiencies with corrective actions are as follows:

J-C-06 Inmate Workers - *Inmates should not be used as substitutes for regular program staff.*

J-G-05 Suicide Prevention Program – *The use of other inmates in any way (e.g., companions, suicide prevention aides) is not a substitute for staff supervision. Inmate companions can be used as a supplement to, but never as a substitute for, staff monitoring.*

In both instances, it is noted that correctional officers were not participating in the watches and watch forms had blank spaces. When this was brought to the attention of the facility director during the survey, corrective action was taken and officers were subsequently observed participating in watches.

On follow-up by the HSA, the following corrective steps were taken in order to assure patient safety and staff compliance with the process:

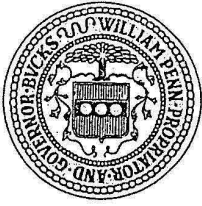
- The watch forms were revised to distinguish between those used by officers and those used by inmate monitors – 1) Officer's Acute Observation Sheet 2) Inmate Acute Monitor Form 3) Inmate Regular Monitor Form (submitted as evidence).
- Distinction of the watch forms further ensures officer accountability in the process.
- Bucks County Correctional Facility's SOP Sec. 4.60 was revised on September 22, 2016 and specifies the types of watches employed at the facility and defines the roles of correctional staff and inmate workers pertaining to regular watches and acute watches (submitted as evidence).
- Starting on September 23, 2016 a memo from Captain Landis to Shift Command was brought up at roll call on each shift, from that day through the following week, educating on, and outlining, the expectations for correctional staff with regard to the watch process (submitted as evidence).
- Observations by the Health Services Administrator revealed the following:
 - Correctional Officers (COs) are rounding on patients with a watch status

- There are no blank spaces on the forms while the watch is in effect (forms submitted as evidence)
- Inmate monitors are used as supplementary help with watches and are educated on their responsibilities (education forms and audit forms submitted as evidence)
- Ongoing education and reinforcement of the watch process by the HSA and facility administration will result in full staff compliance yielding enhanced patient safety

If you have any further questions please feel free to contact me at (215)345-3752.

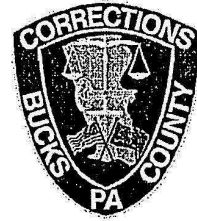
Thank you,

Joseph M. Lynch, MSN, RN
Health Services Administrator
Bucks County Correctional Facility



County of Bucks

DEPARTMENT OF CORRECTIONS



TO : SHIFT COMMAND
FROM : CAPTAIN GREGORY LANDIS
DATE : SEPTEMBER 23, 2016
SUBJECT: WATCHES

Attached are copies of the new monitor forms that we will start using on Wednesday night September 28 2016 at 22:00. You should familiarize yourself with them so, on Wednesday night when we start using them, they get filled out properly. Any questions can be addressed at roll call.

Bring the following up at roll every day until instructed otherwise.

We have made changes to the SOP and the way we require officers to observe inmates that are on watch status. The following is what we require from the officers as well as what is required of the inmate monitors.

INMATES ON REGULAR WATCH:

- The inmate monitors will continue to observe these inmates in the same manner in which they always have, every 15 minutes, along with making an entry as to what the inmate is doing.
- The inmate monitor will be responsible for signing the form when they start the watch and then initialing it every 15 minutes when they make their entries.
- The ONLY signature that the officer needs to make on the form is at the top of the form at the end of each shift. They should be printing and signing their name on the form as well as placing the date on the form acknowledging that the form was completed throughout their shift.
- The officers now make electronic log entries every 30 minutes that they have completed a tour. Along with this entry they will now need to not only say that they toured the module but also that all inmates have been observed and that there are no issues at this time.
- Each form should also be signed and dated by a supervisor acknowledging that sometime during each shift a supervisor reviewed it.
- The new regular watch form covers a 24 hour period; there should only be 1 form per day per inmate on regular watch.

INMATES ON ACUTE WATCH:

- Inmate monitors who are watching inmates on acute watch will continue to monitor them the same way they always have. They should be signing the form when they start the watch, maintain constant observation of the inmate, and make an entry as to what the inmate is doing every 5 minutes along with initialing their entries. The officers should be signing the inmate acute monitoring forms once at the end of the shift acknowledging that it was completed.
- For the officers there is a new form that they will be responsible for filling out for their entire shift. This sheet should be kept at the officers podium and filled out throughout the shift; they should be observing inmates on acute watch at RANDOM INTERVALS not to exceed 15 minutes. The time you observe the inmate should be recorded as well as what the inmate is doing.
- The officers should be printing and signing their names on the form at the beginning of their shift along with writing the date on it. And then, when they make their entries (at random intervals not to exceed 15 minutes), they can initial their entries. Relief officers need to maintain these forms when they are on the unit, by putting their name at the top of the form and making entries as required. Each of these forms should also be signed and dated by a supervisor acknowledging that sometime during the shift a supervisor reviewed it.

The 3 forms that we will be using, the regular watch forms for the inmate monitors as well as the acute watch monitor forms and the officers form are either new or have been changed so we need to make sure that only the new ones are being used.

Captain Greg Landis

1730 S. Easton Rd.
Doylestown Pa. 18901
(215) 345 - 3728